

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

In re Application of FORENSIC NEWS LLC
and SCOTT STEDMAN for an Order Pursuant
to 28 U.S.C. § 1782 to Conduct Discovery for
Use in a Foreign Proceeding.

Case No. 22-mc-1617

DECLARATION OF SCOTT STEDMAN

I, SCOTT STEDMAN, pursuant to 28 U.S.C. § 1746, declare:

1. I am a Petitioner in the above-captioned matter and a defendant in *Soriano v. Forensic News LLC*, Claim No. QB-2020-002450. I submit this declaration in support of Petitioners' Application for an Order Pursuant to 28 U.S.C. § 1782 (the "Application") seeking leave to issue a subpoena for documents and deposition testimony from Israeli private investigator Aviram Azari. Unless otherwise stated below, I have personal knowledge of the following facts, and if called to do so, could and would competently testify to such matters under oath.

2. I am an investigative journalist whose work has been cited by various outlets, including the BBC, the Guardian, and the Washington Post. I founded the independent news outlet Forensic News in 2019.

3. I have conducted research on Mr. Azari and, based on that research, believe that Mr. Azari has worked with or for Mr. Soriano on surveillance and cyber-intelligence operations at the behest of Russian oligarchs.

4. Public reporting by award-winning Israeli journalist Ronen Bergman indicates that Mr. Azari provides cyber-services for Russian oligarchs. *See* Champion Decl. Ex. 18 at 6. It specifically indicates that Mr. Azari worked for Dmitry Rybolovlev in connection with an

artwork dispute—the same artwork dispute that the Senate Intelligence Committee reported Mr. Soriano worked on in 2016. *See id.*; *see also* Champion Decl. Ex. 8 at 5. Mr. Soriano connected Mr. Rybolovlev to Mr. Azari, as well as to Xx, Psy Group. Forensic News described Mr. Soriano’s connections to Mr. Rybolovlev and this artwork dispute, as well as his connections to Psy Group, in the articles that Mr. Soriano claims are defamatory.

5. I have also spoken to multiple confidential and credible sources who report that Mr. Azari has worked with Mr. Soriano for at least a decade to undertake surveillance and cyber-intelligence operations. According to those sources, wealthy businesspeople and oligarchs have hired Mr. Soriano—or his firm USG Security—and he in turn has hired Mr. Azari to procure surveillance and cyber intelligence services from India, Israel, and elsewhere. I understand that Mr. Azari would procure these services through entities like the India-based “cyber mercenary firm” BellTroX. *See* Champion Decl. Ex. 19 at 2.


6. At least three confidential sources stated that Russian oligarch Oleg Deripaska, through Mr. Soriano, has hired Mr. Azari to secure services from BellTroX in relation to a business dispute between Mr. Deripaska and Strabag, an Austrian construction company. As with Mr. Rybolovlev, Mr. Soriano connected Mr. Deripaska with Mr. Azari. These sources also indicated that Mr. Azari and Mr. Soriano both worked on multiple high-profile litigation matters in Western countries, including the United Kingdom and Switzerland.

7. Based on my research and investigations to date, I believe that Mr. Azari likely has documents and/or information that will corroborate the truth of Forensic News’ publications about Mr. Soriano—especially those that describe Mr. Soriano’s connection to Russian oligarchs and private cyber-intelligence companies. I also believe that Mr. Azari likely has documents and/or information that will help me and my journalist co-defendants undermine Mr. Soriano’s credibility during trial in England.

* * *

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: May 25, 2022


Scott Stedman